

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

NO: 500-06-001241-237

SUPERIOR COURT
(Class Action Division)

LUCIA PALLANTE

and

EMILY PERREAULT

Applicants

v.

ARC AUTOMOTIVE, INC.

and

**JOYSON SAFETY SYSTEMS, formerly
known as KEY SAFETY SYSTEMS, INC.**

and

**TOYODA GOSEI NORTH AMERICA
CORPORATION**

and

**GENERAL MOTORS OF CANADA
COMPANY**

and

**FORD MOTOR COMPANY OF CANADA,
LIMITED**

and

VOLKSWAGEN GROUP CANADA INC.

and

AUDI CANADA INC.

and

BMW CANADA INC.

and

PORSCHE CARS CANADA, LTD.

and

HYUNDAI MOTOR AMERICA

and

KIA CANADA INC.

and

FCA CANADA INC.

Defendants

ANSWER

(Art. 145(2) and 147 C.C.P.)

1. Toyoda Gosei North America Corporation ("Toyoda") hereby responds to the Application to Authorize the Bringing of a Class Action & to Appoint the Applicants as Representative Plaintiffs.
2. Toyoda is represented by Mtres Sylvie Rodrigue et Corina Manole from Torys Law Firm LLP, whose contact information is as follows:

<p>Mtre Sylvie Rodrigue srodrigue@torys.com TORYS LAW FIRM LLP 1 Place Ville Marie, Suite 2880 Montréal, QC H3B 4R4 Tel.: 514.868.5601 Fax: 514.868.5700</p>	<p>Mtre Corina Manole cmanole@torys.com TORYS LAW FIRM LLP 1 Place Ville Marie, Suite 2880 Montréal, QC H3B 4R4 Tel.: 514.868.5628 Fax: 514.868.5700</p>
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3. Toyoda reserves all its legal rights, including the right to contest the jurisdiction of the Court.

MONTREAL, June 29, 2023

Torys Law Firm LLP

TORYS LAW FIRM LLP
Attorneys for the Defendant
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Permanent Code: BS-2554
Our reference: 38066-2003

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DISTRICT OF MONTRÉAL
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**LUCIA PALLANTE
EMILY PERREAULT**

Applicants

v.

ARC AUTOMOTIVE, INC.

**JOYSON SAFETY SYSTEMS, formerly known as KEY
SAFETY SYSTEMS, INC.**

TOYODA GOSEI NORTH AMERICA CORPORATION

GENERAL MOTORS OF CANADA COMPANY

FORD MOTOR COMPANY OF CANADA, LIMITED

VOLKSWAGEN GROUP CANADA INC.

AUDI CANADA INC.

BMW CANADA INC.

PORSCHE CARS CANADA, LTD.

HYUNDAI MOTOR AMERICA

KIA CANADA INC.

FCA CANADA INC.

Defendants

ANSWER
(Art. 145(2) and 147 C.C.P.)

ORIGINAL

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